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16		DISTRICT COURT
17		
18	NORTHERN DISTR	ICT OF CALIFORNIA
19	In re EXODUS COMMUNICATIONS, INC. SECURITIES LITIGATION) Master File No. C-01-2661-MMC
20) <u>CLASS ACTION</u>
	This Document Relates To:) STIPULATION AND [PROPOSED] ORDER
21	ALL ACTIONS.) CONSOLIDATING HEARING DATES
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STIPULATION 1 Plaintiffs and defendants, through their below-signed counsel stipulate and agree as follows: 2 3 1. There are presently two matters noticed for separate hearings or appearances in this action: a case management conference scheduled for April 7, 2006, and a hearing on Defendant 5 Ellen Hancock's Notice of Motion and Motion for Involuntary Dismissal of Plaintiffs Michael Klein, Teresi Trucking, Inc., William Friedman, and Martin Fox, for Failure to Prosecute, noticed for May 6 7 5, 2006. 8 2. The parties believe that it would reduce the expense and burden of this litigation, both 9 on the Court and the parties, to consolidate the case management conference with the hearing noticed for May 5, 2006, particularly as certain counsel will travel from Los Angeles to appear. 10 Accordingly, the parties jointly ask the Court to consolidate the case management conference 11 and move the case management conference in this matter to May 5, 2006 to coincide with 13 defendants' motion. 14 IT IS SO STIPULATED. 15 DATED: March 28, 2006 LERACH COUGHLIN STOIA GELLER RUDMAN & ROBBINS LLP 16 REED R. KATHREIN JOHN K. GRANT 17 EX KANO S. SAMS II CONNIE M. CHEUNG 18 19 /s/ JOHN K. GRANT JOHN K. GRANT 20 100 Pine Street, Suite 2600 21 San Francisco, CA 94111 Telephone: 415/288-4545 22 415/288-4534 (fax) 23 LERACH COUGHLIN STOIA GELLER **RUDMAN & ROBBINS LLP** 24 WILLIAM S. LERACH 655 West Broadway, Suite 1900 25 San Diego, CA 92101 26 Telephone: 619/231-1058 619/231-7423 (fax) 27 WEISS & LURIE 28 JOSEPH H. WEISS STIPULATION AND [PROPOSED] ORDER CONSOLIDATING HEARING DATES -

C-01-2661-MMC

551 Fifth Avenue, Suite 1600 New York, NY 10176 Telephone: 212/682-3025 212/682-3010 (fax) **WEISS & LURIE** JORDAN L. LURIE LEIGH A. PARKER 10940 Wilshire Blvd., 24th Floor Los Angeles, CA 90024 Telephone: 310/208-2800 310/209-2348 (fax) Co-Lead Counsel for Plaintiffs I, John K. Grant, am the ECF User whose ID and password are being used to file this Stipulation and [Proposed] Order Consolidating Hearing Dates. In compliance with General Order 45, X.B., I hereby attest that Dhaivat H. Shah and Rebecca Justice Lazarus have concurred in this filing. /s/ JOHN K. GRANT JOHN K. GRANT **DATED:** March 28, 2006 O'MELVENY & MYERS LLP DAVID M. FURBUSH BRENT W. WILNER DHAIVAT H. SHAH <u>/s/ DHAIVAT H. SHAH</u> DHAIVAT H. SHAH 2765 Sand Hill Road Menlo Park, CA 94025 Telephone: 650/473-2600 650/473-2601 (fax) Attorneys for Defendants DATED: March 28, 2006 GIBSON, DUNN & CRUTCHER LLP JONATHAN C. DICKEY PAUL J. COLLINS REBECCA JUSTICE LAZARUS /s/ REBECCA JUSTICE LAZARUS REBECCA JUSTICE LAZARUS 1881 Page Mill Road Palo Alto, CA 94304 Telephone: 650/849-5300 650/849-5333 (fax)

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STIPULATION AND [PROPOSED] ORDER CONSOLIDATING HEARING DATES - C-01-2661-MMC

Attorneys for Underwriter Defendants

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ORDER Pursuant to the stipulation of the parties, the case management conference in this matter is continued to May 5, 2006, the date of defendants' pending motion. The case management statement is due on April 28, 2006. IT IS SO ORDERED. DATED: March 28, 2006 HONORABLE MAXINE M. CHESNEY UNITED STATES DISTRICT JUDGE T:\CasesSF\Exodus\STP00029384.doc